

Remarks/Arguments

The rejection of Claims 1, 2, 4-9 under 35 U. S. C. 103(a) as being unpatentable over Les Graves "Deepwater pipeline flooding and pigging without connection to a surface vessel", Transactions – Institute of Marine Engineers, Series C, 1999; Vol 111, Nr 1, pages 151-160 (henceforth referred to as "Graves") in view of Bliss et al. (US Patent 5,883,303) is respectfully traversed.

Les Graves is identified in the article as follows: "Les Graves is a Director of the PSL Group of companies which includes the pipeline pre-commissioning Company Copipe Systems Limited." This apparently is the same person identified as the inventor, Leslie John Graves, of US Patent 5,927,901 that is assigned to Copipe Systems Limited. The "Graves" article and "Graves" patent are directed to the same subject matter with the same deficiencies that have been pointed out in detail in the arguments of Applicants original application US Serial No. 09/892,314, the parent of this Reissue Application, as well as in this application.

The Examiner acknowledges one significant deficiency of Graves by stating:

"However, Graves does not expressly teach pumping and maintaining pressure to assure no leaks as in hydrostatic testing of the present invention."

As to the Bliss et al. patent, the Examiner acknowledges:

"Bliss however does not teach the launcher is submerged and that a SV (or submerged or submersible vehicle) is used to operate the pump."

Therefore, it is respectfully submitted that the error of the proposed combination of Graves and Bliss is most evident in that the combination fail to teach or suggest **all the claim limitations**. Specifically, Claims 1-3:

“...using said SV to pump more water into said pipeline to a test pressure...”

Claims 4 and 5:

“...using a SV, pumping more seawater into said pipeline to a test pressure...”

Claim 6:

“...using a submersible vehicle (SV) to operate at least one pump on a fill and test package to raise the internal pressure of the pipeline sufficiently for hydrostatic testing.”

Claim 7:

“...using a submersible vehicle (SV) to operate one or more pumps on a fill and test package to raise the internal pressure of the pipeline sufficiently for hydrostatic testing.”

Claim 8:

“...using a submersible vehicle (SV) to operate at least one high pressure pump on a fill and test package to pump water into said water filled pipeline to raise the internal pressure of the pipeline sufficiently for hydrostatic testing.”

Claim 9:

“...using a submersible vehicle (SV) to operate one or more high pressure pumps on a fill and test package to pump water into said water filled pipeline to raise the internal pressure of the pipeline sufficiently for hydrostatic testing.”

It is respectfully submitted that the Examiner has failed to provide a combination of references to establish a *prima facie* case of obviousness, and

accordingly, the rejection should be withdrawn and the Claims allowed.

The rejection of Claim 3 under 35 U. S. C. 103(a) as being unpatentable over Les Graves “Deepwater pipeline flooding and pigging without connection to a surface vessel”, Transactions – Institute of Marine Engineers, Series C, 1999; Vol 111, Nr 1, pages 151-160 (henceforth referred to as “Graves”) as modified by Bliss et al. (US Patent 5,883,303) and applied to Claim 1 above and further in view of Corbetta (US Patent 8,234,717) is respectfully traversed.

This claim is a dependant claim on claim 1.

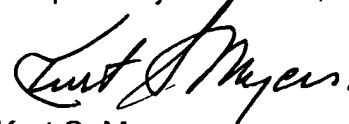
For the reasons set forth in regard to Claim 1 above, the proposed combination of Graves and Bliss as references is deficient. The proposed added combination of Corbetta fails to cure the deficiency of the references to teach or suggest **all the claim limitations**. Specifically,

“...using said SV to pump more water into said pipeline to a test pressure...”

It is respectfully submitted that the Examiner has failed to provide a combination of references to establish a *prima facie* case of obviousness, and accordingly, the rejection should be withdrawn and Claim 3 allowed.

For the reasons stated above, applicants respectfully submit that the rejections of claims 1-9 should be withdrawn. Claims 1-9 should be allowed and such action is respectfully requested.

Respectfully submitted,

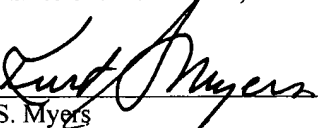


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I hereby certify that this Response to Office Action is being deposited with the U.S. Postal Service as Express Mail (EQ 223539385 US) in an envelope addressed to: Commissioner for Patents, P.O. Box 1450, Alexandria, VA. 22313-1450 on December 1, 2005.


Kurt S. Myers